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VIA ECF

November 18, 2016

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *United States v. Jason Galanis, et al.*, 16 Cr. 371 (RA)

Dear Judge Abrams:

We represent Mr. Bevan Cooney, a defendant in the case referenced above. We write to respectfully request the Court's permission for Mr. Cooney to travel with his family to Jenkins, Kentucky, to visit his wife's ailing grandfather during the Thanksgiving weekend. Separately, we also write to request that the conditions of Mr. Cooney's bond be modified to allow for travel to the state of Montana so that Mr. Cooney can attend to the needs of his mother, who has been diagnosed with terminal brain cancer.

Mr. Cooney's grandfather-in-law, Bob Bartram, has terminal cancer and is under hospice care at his home in Jenkins, Kentucky. Mr. Cooney requests permission to travel to Jenkins, Kentucky from November 25, 2016 to November 27, 2016. Mr. Cooney plans to travel with his wife and two children by car, from their home in Harbor Springs, Michigan, to Jenkins, Kentucky, which is approximately 745 miles south. Mr. Cooney and his family will stay at a hotel in the neighboring city of Pikeville, Kentucky.

Separately, Mr. Cooney's mother, Kathleen Cooney, has been diagnosed with terminal brain cancer, which has been deemed inoperable. Kathleen Cooney is 75 years old and currently resides in Missoula, Montana. The conditions of Mr. Cooney's bond currently allow him to travel to the Southern and Eastern Districts of New York, the district of Nevada, all districts in California, all districts in Michigan, and with the consent of Pretrial Services, all districts in Ohio. Mr. Cooney requests that the conditions of his bond be modified to also allow for travel to the district of Montana (there is only one district in Montana) so that he may spend time with his mother, as well as help attend to her needs, including accompanying her to doctor's visits.

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November 18, 2016
Page 2 of 2

The Court's Pretrial Services Office has been notified of both the request for permission to travel and the request for bond modification and has provided consent to both requests. The Government has also been notified of both of Mr. Cooney's requests and has provided its consent as well.

In light of the above, we respectfully request the following: (1) Mr. Cooney be permitted to travel to Jenkins, Kentucky with his family, from November 25, 2016 to November 27, 2016; and (2) the conditions of Mr. Cooney's bond be modified to allow for travel to the district of Montana with prior approval of Pretrial Services. Thank you for your time and consideration.

Respectfully,

/s/ Diane Bang
Diane Bang

cc: AUSA Brian Blais (via ECF and email)
AUSA Aimee Hector (via ECF and email)
AUSA Rebecca Mermelstein (via ECF and email)
U.S. Pretrial Services Officer Emily Rosado (via email)